

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	
ALEXANDER E. JONES,	§	Chapter 7
	§	
Debtor.	§	Case No. 22-33553 (CML)
	§	

**SIXTH MONTHLY FEE STATEMENT OF PORTER HEDGES LLP, AS BANKRUPTCY
COUNSEL FOR CHAPTER 7 TRUSTEE, CHRISTOPHER R. MURRAY, FOR ALLOWANCE
OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
NOVEMBER 1, 2024 THROUGH NOVEMBER 30, 2024**

Name of Applicant:	Porter Hedges LLP, as Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray
Date of Retention Order:	July 30, 2024 (Doc. No. 792) ¹
Period for which Fees and Expenses are Incurred:	November 1, 2024 through and including November 30, 2024
Interim Fees Incurred:	\$280,799.00
Interim Payment of Fees Requested (80%):	\$224,639.20
Interim Expenses Incurred:	\$12,054.57
Total Fees and Expenses Due:	\$236,693.77

This is the Sixth Monthly Fee Statement.

¹ The Trustee's application to employ Porter Hedges was filed at Docket No. 756.

Porter Hedges LLP (“Porter Hedges”), as Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray (the “Trustee”), submits this Sixth Monthly Fee Statement (the “Fee Statement”) for the period from November 1, 2024 through November 30, 2024 (the “Application Period”) in accordance with the proposed *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Trustee* [Docket No. 793] (the “Interim Compensation Order”).

Porter Hedges requests compensation for professional services rendered in the amount of \$280,799.00 (the “Fees”), and for reimbursement of out-of-pocket expenses incurred in the amount of \$12,054.57 (the “Expenses”), for the period from November 1, 2024 through November 30, 2024. Eighty percent (80%) of the fees equals \$224,639.20 and one hundred percent (100%) of the Expenses equals \$12,054.57 for a total requested amount of \$236,693.77.

Summaries of the calculations for these fees by project category and expenses are attached hereto as **Exhibit 1** and **Exhibit 2**, respectively. A summary of the time expended by Porter Hedges attorneys and support staff, together with their respective hourly rates, is attached hereto as **Exhibit 3**. Porter Hedges’ invoice for the Application Period is attached hereto as **Exhibit 4**.

WHEREFORE, Porter Hedges respectfully requests payment and reimbursement in accordance with the procedures set forth in the proposed Interim Compensation Order (*i.e.*, payment of eighty percent (80%) of the compensation sought, in the amount of \$224,639.20 and reimbursement of one hundred percent (100%) of expenses incurred in the amount of \$12,054.57 in the total amount of \$236,693.77.

Dated: December 11, 2024
Houston, Texas

Respectfully Submitted,

By: /s/ Joshua W. Wolfshohl

PORTER HEDGES LLP

Joshua W. Wolfshohl (TX Bar No. 24038592)

1000 Main St., 36th Floor

Houston, Texas 77002

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jwolfshohl@porterhedges.com

Counsel for the Chapter 7 Trustee,

Christopher R. Murray

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on December 11, 2024.

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl

EXHIBIT 1**SUMMARY OF TIME EXPENDED BY PROJECT CATEGORY**

Project Category	Total Hours	Total Fees Requested
Asset Analysis/Recovery	177.70	129,522.00
Business Operations	6.80	4,330.00
Case Administration	9.90	4,334.50
Employment/Fee Application	4.10	2,540.50
Litigation/Contested Matters	201.70	140,072.00
TOTAL	400.20	280,799.00

EXHIBIT 2**SUMMARY OF OUT-OF-POCKET EXPENSES**

Expenses	Cost
Computer Assisted Legal Research	4,283.24
Computer Services	3,275.17
Delivery Service	24.00
Deposition Expense	435.00
Reproduction	543.45
Reproduction Services	3,493.71
TOTAL	12,054.57

EXHIBIT 3**SUMMARY OF TIME EXPENDED BY ATTORNEYS AND SUPPORT STAFF**

Professional	Hourly Rate	Total Hours
Derek V. Forinash	\$950.00	.50
Joshua W. Wolfshohl	\$945.00	106.00
Sarah J. Ring	\$925.00	5.00
Adam K. Nalley	\$900.00	6.00
Christine M. McMillan	\$785.00	2.10
Matthew R. Baughman	\$750.00	1.80
William R. Stukenberg	\$725.00	11.80
Elliott J. Deese	\$720.00	7.10
Michael B. Dearman	\$625.00	119.70
Jordan T. Stevens	\$595.00	70.20
Kenesha L. Starling	\$575.00	43.60
Daisy Puente	\$565.00	2.60
Grecia V. Sarda	\$500.00	.10
Carey A. Sakert	\$470.00	3.00
Mitzie L. Webb	\$465.00	2.20
Michelle N. Wolff	\$440.00	10.50
Eliana Garfias	\$405.00	8.00
TOTAL		400.20

PORTER HEDGES LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP

DEPT. 510
P.O. BOX 4346
HOUSTON, TEXAS 77210-4346

TELEPHONE (713) 226-6000
TELECOPIER (713) 228-1331

ATTN: CHRIS MURRAY

Invoice Date: December 05, 2024
Invoice Num.: 570995
Matter Number: 018577-0001
Billing Attorney: Joshua W. Wolfshohl
Tax ID: #74-2174193

Matter: Alex Jones

For professional services rendered and costs incurred through November 30, 2024

Professional Services	280,799.00
Disbursements	12,054.57
Total Amount Due	\$292,853.57

PORTER HEDGES LLP

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Time Detail

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/01/2024	MBD	Conference with potential bidder regarding asset information (.3); conference with C. Murray regarding same (.2); conference with J. Tanenbaum regarding auction (.5).	1.00	625.00
11/01/2024	DP	Research and summarize [REDACTED].	2.60	1,469.00
11/02/2024	MBD	Revise proposed Jones IP Assets order and correspond with C. Murray, E. Jones, and J. Wolfshohl regarding same (.2); correspond with A. Nalley regarding transfers and liens (.2); update transaction chart (.2).	0.60	375.00
11/02/2024	JWW	Emails regarding IP issues, hearing setting and sale process.	0.30	283.50
11/02/2024	AKN	Confer with M. Baughman and M. Dearman regarding [REDACTED].	0.30	270.00
11/02/2024	MRB	Receive and reply to email from M. Dearman regarding [REDACTED].	0.50	375.00
11/03/2024	WRS	Revise retention agreements.	1.80	1,305.00
11/04/2024	AKN	Confer with M. Baughman regarding [REDACTED].	0.80	720.00
11/04/2024	JWW	Emails regarding sale issues and status of IP analysis (.4); review fee statement and revise same (.6); conference call with TX and CT plaintiffs regarding potential settlement (.5); follow-up call with E. Jones regarding same (.5); further emails regarding same (.2).	2.20	2,079.00
11/04/2024	MBD	Analyze document production regarding [REDACTED] (2.0); correspond with E. Jones regarding Jones IP Assets issues (.1); conference and correspond with K. Starling regarding potential claims	5.00	3,125.00

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		(.5); draft memorandum on potential causes of action (1.0); attend to correspondence with J. Wolfshohl regarding first interim PH fee application (.2); review invoices for redaction (.5); correspond with W. Cicack regarding form APA (.2); review K. Starling analysis of potential claims (.5).		
11/04/2024	CMM	Prepare summary of [REDACTED] [REDACTED].	2.10	1,648.50
11/04/2024	MLW	Email exchanges with K. Starling regarding Court's request for Status Conference (.1); confer with Case Manager regarding same (.1); update J. Wolfshohl and K. Starling regarding same (.1).	0.30	139.50
11/04/2024	KLS	Conduct research regarding [REDACTED] [REDACTED] (2.1); Teams call with W. Stukenberg regarding employee and contractor agreements (.9); finalize initial drafts of employee agreement and contractor agreements for Trustee review (1.0).	4.00	2,300.00
11/04/2024	WRS	Revise retention agreements for different classes of workers.	1.00	725.00
11/05/2024	MBD	Attend to correspondence regarding appeal of supplemental dismissal order (.1); correspond with K. Starling regarding statute of limitations (.1); review fifth monthly fee statement and invoice and correspond with Y. McCullar regarding same (.2); continue draft first interim PH fee application (.1).	0.50	312.50
11/05/2024	JWW	Emails and phone conference regarding designation of items for record on appeal (.3); conference with C. Murray and E. Jones regarding sale and settlement strategy (.7); further emails and conference with M. Dearman regarding sale issues (.3); work on fee statement (.2).	1.50	1,417.50
11/05/2024	KLS	Conduct research regarding [REDACTED] [REDACTED].	1.40	805.00

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11/06/2024	JWW	Conference with M. Dearman regarding sale issues (.4); review settlement correspondence and emails regarding same (.3); conference with K. Starling regarding same and next steps with appeal (.2); emails regarding open issues in case (.2).	1.10	1,039.50
11/06/2024	AKN	Attend to matters related to [REDACTED] (.4); confer with M. Baughman regarding the same (.1).	0.50	450.00
11/06/2024	MBD	Conference with J. Wolfshohl regarding case strategy (.6); correspond with M. Baughman and A. Nalley regarding potential claims (.1); continue draft first interim PH fee application (2.3); conference with potential bidder, J. Tanenbaum, and K. Toney regarding auction (.5); conference with J. Tanenbaum and K. Toney regarding auction planning (.2); multiple correspondence with J. Wolfshohl regarding asset dispositions (.3).	4.00	2,500.00
11/07/2024	AKN	Confer with M. Baughman regarding [REDACTED].	0.40	360.00
11/07/2024	JWW	Weekly call with trustee team regarding sale process and open issues in case (.6); several emails and follow-up calls regarding meeting with S. Lemmon and issues between TX and CT plaintiffs (1.1).	1.70	1,606.50
11/07/2024	MBD	Continue drafting first interim PH fee application and exhibits (3.0); correspond with E. Jones and J. Chiba regarding same (.1); conference with Trustee team and PH team regarding case status and strategy (.8); correspond with J. Tanenbaum and C. Murray regarding AP news story (.1); legal analysis of [REDACTED] (2.0); attend to correspondence regarding submitted bids (.2).	6.20	3,875.00
11/07/2024	KLS	Attend weekly status call with Trustee via Teams.	0.90	517.50
11/07/2024	MRB	Review issues relating to [REDACTED] and reply to email from M. Dearman regarding	1.30	975.00

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		same (.2).		
11/08/2024	JWW	Phone conference with C. Murray and E. Jones regarding PQPR issues and status of bids (.7); emails and phone conferences with S. Lemmon regarding meeting to discuss settlement (.4); further calls with Trustee team regarding same (.3); conference with J. Martin regarding status of TX/CT issues (.4); meet with S. Lemmon at Jones Murray regarding settlement (1.2); review emails regarding bid submissions (.3); conference with Trustee team regarding same (1.1).	4.40	4,158.00
11/08/2024	MBD	Conference with K. Bates regarding fee application (.2); continue revising first interim PH fee application (.6); correspond with J. Wolfshohl regarding same (.1); review and analyze submitted bids (1.5); correspond with Trustee Team, J. Wolfshohl, and Tranzon360 regarding same (.2); conference with Tranzon360 team, C. Murray, E. Jones, and J. Wolfshohl regarding bids (.8); conference with C. Murray, E. Jones, and J. Wolfshohl regarding same and case strategy (.2).	3.60	2,250.00
11/08/2024	AKN	Review revised draft of APA from First United American Companies LLC.	0.30	270.00
11/09/2024	MBD	Conference with C. Murray regarding submitted bids (.5); confer with Tranzon360 regarding bids (.1); conference with C. Murray, E. Jones, J. Wolfshohl, and J. Tanenbaum regarding same (1.4).	2.00	1,250.00
11/09/2024	JWW	Review analysis of bids and confer with Trustee team and Tranzon regarding same (.6); conference call regarding analysis and strategy for auction (1.4).	2.00	1,890.00
11/10/2024	MBD	Correspond with C. Murray regarding auction questions (.1); review and analyze potential bid recoveries (.2).	0.30	187.50
11/10/2024	JWW	Follow-up regarding auction and review further analysis and draft notice to participants.	0.50	472.50
11/11/2024	JWW	Review further analysis regarding bids and prepare for call with Trustee team (.8); conference call regarding bid	3.40	3,213.00

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		analysis and auction (1.0); further call with E. Jones regarding same and PQPR settlement issues (.3); conference with counsel for PQPR regarding same (.2); further call with E. Jones (.2); review bid sheet for submission to qualified bidders and conference with Trustee team regarding same (.6); further review of overbid sheet and comments to same (.3).		
11/11/2024	MBD	Conference with J. Wolfshohl regarding sealed bid auction (.3); analyze bids and distributions (1.7); conference with C. Murray, E. Jones, J. Tanenbaum, K. Toney, and J. Wolfshohl regarding sealed bid auction (1.0); correspond with C. Murray regarding fees (.1); analyze FSS issues (.3); conference with E. Jones regarding auction and discuss case strategy (.3); review and discuss on overbid form (.5); conference with Trustee Team, Tranzon Team, and J. Wolfshohl regarding same (1.0); conference with K. Starling regarding investigation (.2).	5.50	3,437.50
11/12/2024	JWW	Conference with C. Murray regarding TX/CT settlement (.2); emails and conference with M. Dearman regarding auction issues (.3); follow-up emails with E. Jones regarding same (.1).	0.60	567.00
11/12/2024	MBD	Multiple conferences with J. Tanenbaum, K. Toney, and C. Murray regarding sealed bid auction (.8); conference with J. Wolfshohl regarding sealed bid auction (.1); conference with E. Jones regarding settlement discussions (.9); conference with C. Murray, J. Tanenbaum, and E. Jones regarding sealed bid auction (.8); draft response to C. Murray and J. Tanenbaum regarding sealed bid auction (.2).	2.80	1,750.00
11/12/2024	KLS	Review and analyze PQPR issues.	2.40	1,380.00
11/13/2024	JWW	Review final bids and analysis of bids from Tranzon (.5); conference with Trustee team and Tranzon regarding same (.4); further phone conferences with M. Dearman and Trustee regarding same (.7); further review bid selection information and notice of	2.80	2,646.00

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		successful bid (.5); conference with M. Dearman regarding same (.5); follow-up emails regarding same (.2).		
11/13/2024	AKN	Confer with M. Dearman regarding winning bid and matters related to APA and closing and review comments on draft of APA.	1.50	1,350.00
11/13/2024	MBD	Review and analyze bids (1.4); numerous correspondence and conferences with Trustee professionals regarding auction and bids (3.0); conference with J. Wolfshohl regarding case strategy (.5); correspond with K. Starling regarding claims analysis (.3); review, redline and revise APA (1.5); conference with A. Nalley regarding APA (.2); prepare first PH fee application for filing (1.0).	7.90	4,937.50
11/13/2024	EG	Correspondence on anticipated filing of fee application and notice of successful bidder.	0.10	40.50
11/14/2024	JWW	Emails and phone conferences regarding sale documents and preparation of motion and sale order (.8); conferences with Trustee regarding status conference and issues raised by W. Cicack (.6); prepare for status conference (1.0); attend status conference and further meeting with Trustee and counsel for PQPR regarding potential lien resolution (2.6); conference with K. Kimpler regarding APA for sale and issues related to closing and sale hearing (.4).	5.40	5,103.00
11/14/2024	AKN	Review revised draft of asset purchase agreement and related correspondence.	1.00	900.00
11/14/2024	MBD	Work on notice of successful bidder and backup bidder (.2); correspond with E. Garfias regarding filing (.1); correspond with C. Murray and Trustee professionals regarding notice (.1); revise APA (1.0); clean up schedules of assets (.5); conference and correspond with P. Brillson regarding APA (.3); numerous conferences and correspondence with Trustee team (1.0); conference with E. Jones and J. Wolfshohl regarding status	8.30	5,187.50

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		conference preparations (.5); prepare documents for use at status conference (1.0); attend status conference regarding auction (1.0); conference with K. Starling regarding status conference and employees (.2); conference with E. Jones regarding first interim fee applications (.4); confer with Global Tetrahedron and Connecticut counsel regarding APA (.4); attend to numerous correspondence regarding APA, auction, and next steps (.5); review FSS cash distribution records and correspond with J. Wolfshohl and K. Starling regarding same (1.0); correspond with E. Garfias regarding first interim PH fee application (.1).		
11/14/2024	KLS	Attend emergency status conference regarding auction for the sale of Free Speech Systems, LLC's assets.	0.90	517.50
11/14/2024	EG	Follow up emails on notice of successful bidder (.1); receive, review, and electronically file same with court (.2); monitor emails for status of first interim fee application (.3); receive, review, and electronically file same with court (.2); download and circulate filed version (.1); coordinate service of same (.1).	1.00	405.00
11/15/2024	MBD	Conference with C. Murray, E. Jones, and J. Wolfshohl regarding case strategy (.6); numerous correspondence with P. Brillson regarding APA (.2); conference with P. Brillson regarding same (.2); draft sale motion (4.5); analyze case law governing sale (.5); review draft sale order (.2); numerous correspondence and conferences with J. Wolfshohl regarding sale issues (.5); continue revising APA (2.5); conference with counsel for Connecticut Families and Global Tetrahedron and J. Wolfshohl regarding APA and sale motion and order (.5); review agreed order and provide comments to J. Wolfshohl (.2); conference with K. Starling regarding sale motion and review draft section (.2).	10.10	6,312.50
11/15/2024	JWW	Phone conference with C. Murray regarding next steps with sale (.7); conference with M. Dearman regarding same (.7); conference with W. Cicack regarding	6.00	5,670.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		depositions (.4); conference with J. Tanenbaum regarding sale issues (.4); further conferences with C. Murray regarding same (.4); work on issues related to APA and sale motion and order (.8); conference with E. Jones regarding same (.7); conference with buyer regarding sale documents and next steps (.5); conference with buyer's counsel regarding open issues (.1); further conferences with C. Murray and E. Jones regarding same (.7); conference with J. Tanenbaum regarding sale motion and deposition (.4); follow-up with E. Jones regarding same (.2).		
11/15/2024	KLS	Revise sale motion to include case law.	4.70	2,702.50
11/16/2024	JWW	Work on sale motion (1.5); phone conferences with Trustee team regarding same (1.2).	2.70	2,551.50
11/16/2024	MBD	Continue drafting sale motion (.5); multiple conferences with J. Wolfshohl regarding same (.4); correspond with Trustee team regarding APA and sale order (.3); review and revise sale order (1.5); review and revise APA (1.5); correspond and conference with C. Murray regarding APA and sale order (.2); conference with A. Matott and J. Ashmead regarding APA (.4); review and incorporate revisions to sale motion (1.5); review revisions to APA and correspond with Trustee team regarding same (.2).	6.50	4,062.50
11/17/2024	JWW	Review sale motion and prepare for call with Trustee (.4); conference with Trustee and Tranzon regarding next steps (1.5); follow-up with E. Jones regarding filing of sale motion (.3); review and revise sale motion, APA and exhibits (2.5); conferences with E. Jones regarding same and filing of motion (.5); emails and phone conference with buyer's counsel regarding APA (.3).	5.50	5,197.50
11/17/2024	MBD	Correspond with K. Starling regarding case law research and review findings (.2); attend to correspondence with Trustee team regarding APA and sale motion (.5); revise APA schedules (.1); review revise sale motion (.8); prepare exhibits to sale motion (.4).	2.00	1,250.00

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11/17/2024	KLS	Conduct further research regarding bankruptcy auction/sale process.	3.20	1,840.00
11/18/2024	JWW	Meet with M. Dearman regarding sale motion and various exhibits (.4); review back-up bidder motion to disqualify (.3); further calls with M. Dearman regarding same (.4); work on motion (.8); conference call with Trustee team regarding same (.5); prepare for potential sale hearing and meet with team regarding same (2.8); review complaint filed by A. Jones (.5); conference with E. Jones regarding same (.4).	6.10	5,764.50
11/18/2024	GVS	Confer with M. Dearman, K. Starling, and J. Stevens regarding Jones' complaint and TRO.	0.10	50.00
11/18/2024	MBD	Multiple conferences with J. Wolfshohl regarding sale issues (.5); ongoing revisions of sale motion, APA, and sale order and conferences and correspondence regarding same (.8); conference with J. Ashmead and A. Mattot regarding APA (.3); attend to correspondence regarding sale (1.0); review and analyze motion to disqualify (.8); multiple correspondence with E. Garfias regarding filing (.2); confer with J. Tanenbaum and K. Toney regarding sale motion (.2); review and revise settlement proposal (1.0); correspond with C. Murray, E. Jones, and J. Wolfshohl regarding same (.3); conference and correspond with J. Wolfshohl regarding settlement proposal (.7).	5.80	3,625.00
11/18/2024	EG	Correspondence on filing logistics of sale motion (.2); monitor emails for status of same (.8); call with M. Dearman on submission of same (.1); receive, review, and electronically file same with court (.1); download and circulate filed version (.1).	1.30	526.50
11/19/2024	MBD	Conference with J. Wolfshohl regarding adversary proceeding (.2); conference with J. Stevens regarding case status and litigation issues (.8); analyze Winddown Order and correspond with PH team regarding same (.7); attend to numerous correspondence regarding sale issues	5.10	3,187.50

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		(.2); conference with PH team and Trustee team regarding case strategy and tasks (1.5); conference with A. Nalley regarding corporate issues (.4); review and revise corporate documents (.8); draft response to motion to disqualify (.5).		
11/19/2024	JWW	Work on PQPR settlement and emails with S. Lemmon and R. Mates regarding same (.6); conference with Tranzon regarding sale (.6); conference with E. Jones regarding same (.2); conference with K. Kimpler regarding complaint filed by Jones (.4); further conference with J. Tanenbaum regarding same (.4); meet with C. Murray and E. Jones in preparation for deposition (3.5); conference with K. Kimpler and other parties regarding cancellation of deposition and upcoming hearings (1.1).	6.80	6,426.00
11/19/2024	AKN	Confer with M. Dearman regarding bid process and certain corporate governance and entity matters related to case (.3); review and revise [REDACTED] revised draft of same to M. Dearman (.1).	1.20	1,080.00
11/19/2024	MLW	Email exchanges with K. Sterling regarding scheduling videographer for deposition (.2); coordinate scheduling of same (.1).	0.30	139.50
11/19/2024	KLS	Call with Trustee regarding hearings, status conferences, and deposition.	1.70	977.50
11/19/2024	JTS	Prepare for and attend an extended strategy session with J. Wolfshohl, the Trustee, and E. Jones regarding the Sale Motion, the Motion to Disqualify, and the Emergency Application (1.7); review and analyze the Motion to Disqualify (.9); review and analyze the Emergency Application (1.2); conduct legal research and analysis regarding the Emergency Application (2.4); begin outlining and drafting an Objection to the Emergency Application (2.2).	8.40	4,998.00
11/19/2024	EG	Correspondence on logistics of upcoming deposition.	0.20	81.00

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11/20/2024	SJR	Correspondence regarding IP argument (.3); Research law regarding the same (1.5).	1.80	1,665.00
11/20/2024	MNW	Begin research regarding [REDACTED] [REDACTED]	6.10	2,684.00
11/20/2024	JWW	Conference with Trustee team regarding hearing preparation (.5); conference with CT parties' counsel regarding same (.8) work on responses to various pleadings and hearing preparation (2.3); conference with counsel for purchaser regarding hearings (.5); further conference with PH team regarding TRO and hearing preparation (1.0); review pleading from A. Jones (.3).	5.40	5,103.00
11/20/2024	MBD	Attend to numerous correspondence with PH team regarding TRO hearing and strategy (.7); correspond and conference with M. Webb regarding notice of hearing (.3); attend call with Connecticut Families' counsel regarding TRO hearing (.4); analyze case law regarding TRO and response issues (2.0); conference with counsel for GT regarding case strategy (.4); conference with J. Wolfshohl regarding hearing preparations and strategy (.4); draft response to motion to disqualify (2.0); analyze Winddown Order (.7).	6.90	4,312.50
11/20/2024	MLW	Email exchanges with K. Starling regarding preparation and service of Notice of Status Conference regarding Sale Motion (.1); draft and circulate same (.3).	0.40	186.00
11/20/2024	KLS	Begin Trustee's witness and exhibit list, including preparation of exhibits for November 25th hearing (1.5); Teams call with Paul Weis regarding hearing (.9); Teams call with counsel to the Onion regarding hearing (.5); Teams call with J. Wolfshohl and Trustee regarding hearing (1.0).	3.90	2,242.50
11/20/2024	JTS	Prepare for and attend a conference call with counsel to the Connecticut Families regarding the Motion to Disqualify and the Emergency Application (.8); prepare for and attend a conference call with counsel to the Connecticut Families and Global Tetrahedron regarding	11.40	6,783.00

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		the Motion to Disqualify and the Emergency Application (.6); prepare for and attend a strategy session with members of the Porter Hedges Team, C. Murray, and E. Jones regarding the the Motion to Disqualify and the Emergency Application (1.0); conduct legal research and analysis regarding a response to the Emergency Application, and review and analyze relevant docket entries pertaining to the same (4.2); draft an Objection to the Emergency Application (4.8).		
11/20/2024	WRS	Provide strategy regarding TRO hearing; review TRO filings.	2.20	1,595.00
11/20/2024	EG	Correspondence and call on status of service along with scheduled hearing (.2); receive, review, and electronically file notice of hearing (.2); coordinate service of sale motion along with notice of hearing (.4); follow up emails on same (.1); further emails on filing logistics of witness/exhibit list (.2).	1.10	445.50
11/20/2024	CAS	Email communications with Chris Murray regarding data collection and provide C. Murray with FTP upload link to transfer data to K. Starling (.3); numerous communications with vendor ID regarding data collection from C. Murray and provide ID with search parameters (1.3).	1.60	752.00
11/21/2024	MNW	Continue research regarding [REDACTED] (2.8); confer with E. Deese and S. Ring regarding same (.3).	3.10	1,364.00
11/21/2024	JWW	Conference with counsel for buyer regarding upcoming hearings (.8); work on response to TRO (3.0); emails and phone conferences with PH team regarding same and hearing preparation (1.0); further review and revise response to TRO (.5); conference with E. Jones regarding hearing preparation and other matters in case (.9); emails with PH team regarding response (.3); work on response to TRO (.5); review exhibits filed by A. Jones and emails with PH team regarding same (.6).	7.60	7,182.00
11/21/2024	MBD	Conference with PW and GT counsel (.5); review case	10.90	6,812.50

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		law governing IP issues and schedules (2.0); multiple conference with PH team regarding upcoming hearings and responses (1.0); review and revise response to TRO (3.3); continue draft response to motion to disqualify (1.5); continue analyzing case law governing litigation issues (1.3); conference with J. Stevens regarding opposition to TRO and response to motion to disqualify (1.0); correspond with M. Webb and E. Garfias regarding witness/exhibit list (.1); review and comment on witness/exhibit list (.2).		
11/21/2024	EJD	Research regarding IP rights in bankruptcy (2.0); Review and revise email memorandum drafted by M. Wolff (.8).	2.80	2,016.00
11/21/2024	SJR	Confer with associates regarding research related to IP rights (1.7); review and revision of write up of law (.5).	2.20	2,035.00
11/21/2024	MLW	Email exchanges regarding witness/exhibit list for November 21st hearing, confer with E. Garfias regarding same.	0.40	186.00
11/21/2024	KLS	Begin chart of Trustee's objections to Jones' TRO exhibits (1.9); call with Paul Weis regarding hearing (.9); complete Trustee's witness and exhibit list and associated exhibits (2.1); revise Trustee's objection to Jones's TRO (5.2).	10.10	5,807.50
11/21/2024	JTS	Prepare for and attend a conference call with counsel to the Connecticut Families and Global Tetrahedron regarding the Motion to Disqualify and the Emergency Application (1.0); prepare for and attend a strategy session with members of the Porter Hedges Team, C. Murray, and E. Jones regarding the Motion to Disqualify and the Emergency Application (.4); conduct legal research and analysis regarding a response to the Emergency Application, and review and analyze relevant docket entries pertaining to the same (5.6); draft an Objection to the Emergency Application (3.1); conduct legal research and analysis regarding the Motion to Disqualify and begin outlining a response	13.50	8,032.50

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		thereto (3.4).		
11/21/2024	WRS	Review exhibit and witness list and revise response to motion for TRO.	1.40	1,015.00
11/21/2024	EG	Correspondence on filing logistics of witness/exhibit list (.2); discuss same with M. Webb (.2); continuous monitoring of emails for status finalizing same and timing of filing (1.0); receive, review, and electronically file same with court (.3); download and circulate filed version (.1).	1.80	729.00
11/22/2024	MNW	Begin research regarding [REDACTED] (1.1); confer with E. Deese regarding same (.2).	1.30	572.00
11/22/2024	JWW	Meet with Trustee and prepare for hearings (6.5); conference call with counsel for co-defendants regarding TRO hearing (.6); further preparation for hearings (.8).	7.90	7,465.50
11/22/2024	MBD	Conference with J. Wolfshohl regarding case status and strategy (.4); correspond with E. Deese and PH team regarding intellectual property questions (.1); analyze case law governing same (1.5); draft analysis of intellectual property issues (.5); conference with E. Deese regarding intellectual property issues (.3); conference with J. Wolfshohl regarding sale issues (.2); conference with J. Stevens regarding motion to disqualify (.4).	3.40	2,125.00
11/22/2024	EJD	Continue research on the [REDACTED] (3.0); draft email memorandum regarding same (1.3).	4.30	3,096.00
11/22/2024	SJR	Review of research and correspondence regarding IP Law issues.	1.00	925.00
11/22/2024	KLS	Complete Trustee's chart regarding objections to Jones's November 25th hearing exhibits.	3.10	1,782.50
11/22/2024	JTS	Prepare for and attend a conference call with counsel to the Connecticut Families and Global Tetrahedron regarding the Motion to Disqualify and the Emergency Application (.8); conduct legal research and analysis	7.60	4,522.00

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		regarding the Motion to Disqualify, including in light of relevant docket filings (2.9); draft an Objection to the Motion to Disqualify (2.3); review the Objection to the Emergency Application in light of feedback thereto from the Porter Hedges Team and the Trustee (1.6).		
11/22/2024	WRS	Develop strategy for TRO.	1.00	725.00
11/23/2024	MBD	Conference with J. Wolfshohl regarding TRO hearing and strategy (.4); conference with J. Stevens regarding objection to motion to disqualify (.3); continue drafting objection to motion to disqualify (2.5); review pleadings from counsel to the Connecticut Families (.4).	3.60	2,250.00
11/23/2024	JWW	Prepare for hearings.	5.00	4,725.00
11/23/2024	JTS	Conduct legal research and analysis regarding the Motion to Disqualify, including in light of relevant docket filings (4.8); draft an Objection to the Motion to Disqualify, including in light of feedback thereto from the Porter Hedges Team (2.7).	7.50	4,462.50
11/23/2024	EG	Correspondence regarding filings.	0.20	81.00
11/24/2024	JWW	Prepare for hearings (1.0); meet with C. Murray in preparation for hearings (3.0); phone conference with counsel for GT and CT regarding hearings (.4); continue preparing for hearings and drafting and revising pleadings (1.0); further phone conferences regarding same (1.2); work on final comments to pleadings (.8).	7.40	6,993.00
11/24/2024	MBD	Conference with J. Stevens regarding objection to motion to disqualify (.1); multiple correspondence with J. Stevens regarding same and objection to TRO (.5); review objection to motion to disqualify and correspond with counsel regarding same (.3); conference with GT counsel and Connecticut Families' counsel regarding filings (.2); revise objection to motion to disqualify (1.0); revise objection to TRO application (.8); draft motion to pay undisputed claims (.2); continue draft 9019 motion (.3); conference with GT counsel and Connecticut Families' counsel regarding filings (.5);	4.20	2,625.00

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		conference with J. Wolfshohl and J. Stevens regarding multiple filings (.2); correspond with E. Garfias regarding same (.1).		
11/24/2024	MLW	Email exchanges with K. Starling regarding November 25th hearing logistics.	0.40	186.00
11/24/2024	JTS	Conduct supplemental legal research and analysis regarding the Motion to Disqualify (2.1); draft and revise Objection to the Motion to Disqualify, including in light of feedback thereto from the Porter Hedges Team (1.8); draft and revise the Objection to the Emergency Application, including in light of feedback from the Porter Hedges Team and E. Jones (2.4); edit and finalize the Objection to the Emergency Application (1.7); assist in preparing for the hearing on the Emergency Application, including conducting supplemental research and analysis (1.5).	9.50	5,652.50
11/24/2024	EG	Correspondence on filing logistics of objection motion to disqualify and objection to TRO (.2); continuous monitoring of emails for status of finalizing same (.5); receive, review, and electronically file same with court (.4); download filed versions (.2).	1.30	526.50
11/25/2024	JWW	Prepare for hearing (6.0); attend hearing (2.0); meet with Trustee team regarding sale hearing (.5); further preparation for upcoming hearings (.7).	9.20	8,694.00
11/25/2024	MBD	Conference with J. Tanenbaum regarding case status (.2); compile potential document production and correspond with C. Sakert regarding same (.5); review and analyze X Corp. limited objection and terms of service (1.0); attend hearing on emergency TRO (1.0); analyze arguments raised at hearing (.3).	3.00	1,875.00
11/25/2024	KLS	Attend status conference regarding Trustee's Sale Motion, hearing regarding Debtor's Application for Temporary Restraining Order and Plaintiffs' Motion for Reconsideration.	2.50	1,437.50
11/25/2024	JTS	Assist in preparing for and attend the hearing on the	4.40	2,618.00

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		Emergency Application and related proceedings.		
11/25/2024	WRS	Prepare for and participate in hearing on TRO.	3.40	2,465.00
11/25/2024	CAS	Email communications with M. Dearman regarding collection of additional email to be loaded into database (.2); receive data and forward same to vendor with instructions for processing and loading (.2).	0.40	188.00
11/26/2024	MBD	Correspond with D. Forinash regarding trademark issues (.1); attend to correspondence regarding sale hearing (.2); conference with PH team and Trustee team regarding hearing preparations (.5); review documents for production (.2); conference with J. Wolfshohl regarding sale issues (.3); revise draft stipulation and agreed order (.2).	1.50	937.50
11/26/2024	JWW	Emails regarding discovery and hearing dates (.6); conference call with Trustee team regarding same (.9); follow-up discussions with M. Dearman regarding hearing preparation and discovery (.3); further emails with counsel regarding discovery and sale objection issues (1.0).	2.80	2,646.00
11/26/2024	DVF	Responding to email regarding renewal of INFOWARS mark.	0.50	475.00
11/26/2024	KLS	Teams call with Trustee regarding Sale Motion Hearing.	1.00	575.00
11/26/2024	JTS	Prepare for and attend a strategy session with members of the Porter Hedges Team, the Trustee, and E. Jones regarding discovery in connection with the Sale Motion.	1.00	595.00
11/26/2024	WRS	Participate in discovery strategy call.	1.00	725.00
11/26/2024	CAS	Receive additional client data from M. Dearman and forward same to vendor with instructions for adding to database.	0.40	188.00
11/27/2024	JWW	Work on PQPR settlement (.9); emails regarding discovery before sale hearing and related hearing preparation issues (1.9); conference with J. Tanenbaum regarding deposition and related issues (.6); correspond	4.60	4,347.00

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		with various parties regarding hearing on sale motion and expedited discovery and review discovery requests (1.2).		
11/27/2024	MBD	Multiple correspondence with J. Wolfshohl and K. Starling regarding hearing (.5); revise draft stipulation and agreed order (.7); multiple correspondence with C. Murray, E. Jones, and J. Wolfshohl regarding same (.3); conference with J. Wolfshohl regarding draft stipulation and agreed order (.2); review notice of hearing (.1); continue draft 9019 motion (.8); review PQPR adversary proceeding pleadings (.5).	3.10	1,937.50
11/27/2024	MLW	Email exchanges with K. Starling regarding Notice - Motion to Sale (.2); confer with E. Garfias regarding filing same (.1); forward copy of Notice to Court Case Manager (.1).	0.40	186.00
11/27/2024	KLS	Draft Notice regarding Hybrid Hearing on Trustee's Sale Motion.	0.40	230.00
11/27/2024	EG	Correspondence on filing logistics of notice of hybrid hearing (.2); discuss same with M. Webb (.1); receive, review, and electronically file same with court (.2); coordinate service of same (.3); download and circulate filed version (.1); update file (.1).	1.00	405.00
11/27/2024	CAS	Multiple email communications with vendor regarding new client data and organization of saved searches.	0.60	282.00
11/28/2024	JWW	Emails with Trustee team regarding discovery requests and deposition schedule (.3); follow-up regarding open issues related to sale hearing (.2).	0.50	472.50
11/29/2024	MBD	Conference with Trustee team and PH team regarding discovery (.6); review correspondence related to sale process (.5); conference with J. Tanenbaum, J. Wolfshohl and E. Jones regarding discovery (.4); correspond with J. Stevens and K. Starling regarding discovery issues (.1); review documents for production (1.3); conference with J. Stevens regarding discovery issues (.2).	3.10	1,937.50

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11/29/2024	JWW	Conference with Trustee team regarding discovery responses and depositions (1.0); several emails regarding same (.2); conference with J. Tanenbaum regarding same (.5); follow-up emails regarding document production (.4).	2.10	1,984.50
11/29/2024	KLS	Teams call with J. Wolfshohl regarding expedited discovery requests from counsel to A. Jones (.4); begin draft witness and exhibit list for hearing regarding Trustee's Sale Motion (.2); review documents from Tranzon360 in preparation of production of documents in response to expedited discovery request from counsel to Debtor A. Jones (1.3).	1.90	1,092.50
11/29/2024	JTS	Conduct legal research and analysis in connection with the discovery related to the Sale Motion (3.1); review and analyze the discovery requests from Alex Jones (.8); prepare for and attend a strategy session with members of the Porter Hedges Team, the Trustee, and E. Jones regarding the discovery relating to the Sale Motion (.7); assist in responding to Alex Jones's discovery requests, including analyzing documents to be provided in connection therewith (2.3).	6.90	4,105.50
11/30/2024	MBD	Numerous correspondence with K. Starling regarding discovery (.5); review documents for production (2.0); correspond with J. Wolfshohl regarding same (.2); correspond with C. Murray regarding trademark issues (.1).	2.80	1,750.00
11/30/2024	JWW	Review documents uploaded and emails regarding production and timing.	0.50	472.50
11/30/2024	KLS	Continue review of Tranzon360 documents for production in response to request for expedited discovery by counsel to Debtor A. Jones.	1.50	862.50
Total			400.20	\$280,799.00
Total Services				\$280,799.00

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Timekeeper Summary

<u>Initials</u>	<u>Name</u>	<u>Timekeeper Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
DVF	Derek V. Forinash	Partner	0.50	950.00	475.00
JWW	Joshua W. Wolfshohl	Partner	106.00	945.00	100,170.00
SJR	Sarah J. Ring	Partner	5.00	925.00	4,625.00
AKN	Adam K. Nalley	Partner	6.00	900.00	5,400.00
CMM	Christine M. McMillan	Partner	2.10	785.00	1,648.50
MRB	Matthew R. Baughman	Partner	1.80	750.00	1,350.00
WRS	William R. Stukenberg	Partner	11.80	725.00	8,555.00
EJD	Elliott J. Deese	Associate	7.10	720.00	5,112.00
MBD	Michael B. Dearman	Associate	119.70	625.00	74,812.50
JTS	Jordan T. Stevens	Associate	70.20	595.00	41,769.00
KLS	Kenesha L. Starling	Associate	43.60	575.00	25,070.00
DP	Daisy Puente	Associate	2.60	565.00	1,469.00
GVS	Grecia V. Sarda	Associate	0.10	500.00	50.00
CAS	Carey A. Sakert	Paralegal	3.00	470.00	1,410.00
MLW	Mitzie L. Webb	Paralegal	2.20	465.00	1,023.00
MNW	Michelle N. Wolff	Associate	10.50	440.00	4,620.00
EG	Eliana Garfias	Paralegal	8.00	405.00	3,240.00
Total			400.20		\$280,799.00

Cost Summary

<u>Description</u>	<u>Amount</u>
Computer Assisted Legal Research	4,283.24
Computer Services	3,275.17
Delivery Service	24.00
Deposition Expense	435.00
Reproduction	543.45
Reproduction Services	3,493.71
Total Disbursements	\$12,054.57

Total This Invoice **\$292,853.57**